



Centers for Medicare and Medicaid Services

7500 Security Blvd Baltimore, MD, 21244

July 14, 2016

RE: Written Comments on the Healthy Ohio 1115 Medicaid Waiver Application

To Whom It May Concern,

On behalf of the National Multiple Sclerosis Society and more than 20,000 Ohioans living with multiple sclerosis, I wish to offer the following comments regarding the Healthy Ohio 1115 Medicaid Demonstration Waiver and urge you to reject it.

MS interrupts the flow of information from the brain to the body and stops people from moving. Every hour in the United States, someone is newly diagnosed with MS, an unpredictable, often disabling disease of the central nervous system. Symptoms range from numbness and tingling to blindness, and even paralysis. The progress, severity and specific symptoms of MS in any one person cannot yet be predicted. The cause is unknown and there is no cure. Most people with MS are diagnosed between the ages of 20 and 50 and it is the leading cause of disability in young adults. MS affects more than 2.5 million worldwide.

The National MS Society supports the current system of expansion of Medicaid in Ohio, because this model does not place an undue financial burden on beneficiaries, especially those with incomes below the poverty line, and does not set a dangerous precedent that other states may seek to replicate. We, however, oppose the 1115 waiver as written. We are concerned that the proposed changes will decrease access to health care and complicate an already complex system, possibly leading to an increase in Ohio's vulnerable uninsured population by over 600,000. The bureaucratic requirements to comply with the waiver will place significant burdens on the front office staff of health care providers serving Medicaid patients, as well as the managed care companies in which the patients are enrolled.

We are also concerned that health outcomes will decline as financial burdens will hinder the clients' ability to pursue and receive care. The monthly 'contributions' under the plan serve as financial barriers. Ohio has proposed a demonstration hypothesis – that "premiums will not pose a barrier to eligible participants enrolling in Medicaid." However, this hypothesis has already been tested many times in other states with the results showing quite the opposite: in those situations which should not be replicated, premiums and cost-sharing deter people with low incomes from accessing needed medical care. A recent report by the Assistant Secretary for Planning and Evaluation (ASPE) at the U.S.

Department of Health and Human Services detailed this research and also showed that people living in poverty tend to be less healthy and need more medical care than people with higher incomes.<sup>1</sup>

Thank you for your willingness to consider our comments. We hope that this waiver program is rejected so that Ohioans living with MS and other disabilities and chronic conditions can continue to access the Medicaid services they need to live their best lives.

Respectfully,

A handwritten signature in dark ink, appearing to read "Holly L. Pendell". The signature is fluid and cursive, with the first name "Holly" and last name "Pendell" clearly distinguishable.

Holly L Pendell

Sr. Manager Advocacy

National MS Society

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<sup>1</sup> Office of the Assistant Secretary for Planning and Evaluation, "Financial Condition and Health Care Burdens of People in Deep Poverty," July 16, 2015, <http://aspe.hhs.gov/basic-report/financial-condition-and-health-care-burdens-people-deep-poverty>